

# EXHIBIT C

Steve W. Berman (*pro hac vice*)  
Mark S. Carlson (*pro hac vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1301 Second Ave., Ste. 2000  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com  
markc@hbsslaw.com

Philip Graves (CBA No. 153441)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
301 North Lake Avenue, Suite 920  
Pasadena, CA 91101  
Telephone: (213) 330-7150  
Facsimile: (213) 330-7152  
philipg@hbsslaw.com

Rio S. Pierce (CBA No. 298297)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
riop@hbsslaw.com

*Attorneys for Plaintiff*  
Rearden LLC and Rearden Mova LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

REARDEN LLC, REARDEN MOVA LLC,  
California limited liability companies,

Plaintiffs,

v.

TWENTIETH CENTURY FOX FILM  
CORPORATION and TWENTIETH CENTURY  
FOX HOME ENTERTAINMENT, LLC,

Defendants.

No. 3:17-CV-04191-JST

**PLAINTIFFS' SUPPLEMENTAL  
INTERROGATORIES TO  
DEFENDANT TWENTIETH  
CENTURY FOX FILM  
CORPORATION**

Pursuant to ECF No. 166 and Rule 33 of the Federal Rules of Civil Procedure, plaintiffs Rearden LLC and Rearden Mova LLC hereby serve the following interrogatories on defendant Twentieth Century Fox Film Corporation.

**INSTRUCTIONS**

A. These Interrogatories seek complete and full responses as of the date the responses are executed, and which reflect or embody all relevant information or documentation known to YOU and/or within YOUR custody and/or control as of that date. Should YOU later learn that any response was incomplete, incorrect when made, or though correct when made is no longer accurate, the response shall be timely supplemented as required by Rule 26 of the Federal Rules of Civil Procedure.

B. In responding to the following Interrogatories, furnish all information available, including information in the possession, custody or control of FOX and its representatives, not merely information within the personal knowledge of the person responding to the Interrogatories.

C. All responses and objections shall be made in writing and delivered to the offices of Hagens Berman Sobol Shapiro LLP, 1301 Second Ave., Ste. 2000, Seattle, Washington, 98101.

**DEFINITIONS**

A. ENTITY shall mean any organization, firm, corporation, partnership, sole proprietorship, or other legal entity that is not a natural person. The acts “of an ENTITY” include the acts of owners, directors, officers, members, employees, agents, attorneys, representatives, contractors, and any other person acting on the ENTITY’s behalf.

B. When referring to an ENTITY, “to IDENTIFY” means to give the ENTITY’s full legal name, type of entity (e.g., corporation, LLC, etc.), nation and state or province under which the ENTITY is organized or principally registered, any fictitious names or dbas under which the ENTITY is doing business, present or last known address of the ENTITY’s headquarters, and the ENTITY’s primary telephone number.

C. FOX, YOU, or YOUR as used herein means Twentieth Century Fox Film Corporation and all past or present divisions, and parents, subsidiaries, or affiliates of Twentieth Century Fox

Film Corporation, all past or present joint ventures, partnerships, and limited partnerships of which any of the foregoing entities is a joint venture or a limited or general partner, including but not limited to Fox US Productions 40, Fox US Productions 31, and Fox Louisiana Productions, and all past or present owners, directors, officers, members, employees, agents, attorneys, representatives, contractors, and any other persons under the control of any of the foregoing entities.

D. ACCUSED FILMS as used herein means *Night at the Museum: Secret of the Tomb* (2014), *Fantastic Four* (2015), and *Deadpool* (2016).

E. FOX FILMS DEPOSITION as used herein means the June 21, 2019 Deposition of Twentieth Century Fox Film Corporation pursuant to Fed. R. Civ. P. 30(b)(6).

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1:**

IDENTIFY the following contracts and their custodians relating to the ACCUSED FILMS:

- (a) Contract between FOX and Twentieth Century Fox Home Entertainment
- (b) Contract between FOX and Twentieth Television
- (c) Contract between FOX and Fox US Productions 40
- (d) Contract between FOX and Fox US Productions 31
- (e) Contract between FOX and Fox Louisiana Productions
- (f) Contract between FOX and TCF Vancouver Productions
- (g) Contract between FOX and Tim Miller
- (h) Contract between FOX and Blur Studios
- (i) Contract between FOX and Josh Trank
- (j) Contract between FOX and Shawn Levy
- (k) Contract between FOX and Luma Pictures
- (l) Contract between FOX and The Moving Picture Company

#### **RESPONSE:**

#### **INTERROGATORY NO. 2:**

1 IDENTIFY the persons including officers, employees, and independent contractors at FOX  
2 who worked on visual effects for the Colossus character in *Deadpool*.

3 **RESPONSE:**

4  
5  
6 **INTERROGATORY NO. 3:**

7 IDENTIFY the persons including officers, employees, and independent contractors at FOX  
8 who worked on visual effects for the Ben Grimm/the Thing character in *Fantastic Four*.

9 **RESPONSE:**

10  
11 **INTERROGATORY NO. 4:**

12 IDENTIFY the persons including officers, employees, and independent contractors at FOX  
13 who worked on visual effects for the Bust of Caesar, Lord Nelson, and Charles Darwin characters in  
14 *Night at the Museum: Secret of the Tomb*.

15 **RESPONSE:**

16  
17 **INTERROGATORY NO. 5:**

18 For each of the following entities, state whether it maintains a physical document repository,  
19 whether it maintains a digital document repository, and whether each of its officers, employees, and  
20 independent contractors who were primarily responsible for visual effects in the ACCUSED FILMS  
21 used @fox.com email addresses and, if an individual did not use an @fox.com email address, state  
22 the email address used and identify the host entity:

23 (a) Fox US Productions 40

24 (b) Fox US Productions 31

25 (c) Fox Louisiana Productions

26 **RESPONSE:**

**INTERROGATORY NO. 6:**

For each document repository identified in your answer to Interrogatory No. 8, IDENTIFY the custodian.

**RESPONSE:**

DATED: August 8, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

By /s/ Philip Graves  
Philip Graves

Steve W. Berman (*pro hac vice*)  
Mark S. Carlson (*pro hac vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
steve@hbsslaw.com  
markc@hbsslaw.com

Philip Graves (CBA No. 153441)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
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Berkeley, CA 94710  
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